



Hogan Lovells US LLP  
875 Third Avenue  
New York, NY 10022  
T +1 212 918 3000  
F +1 212 918 3100  
[www.hoganlovells.com](http://www.hoganlovells.com)

January 29, 2015

Judge Paul A. Crotty, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 1350  
New York, NY 10007

Re: *Donoghue v. Achillion Pharmaceuticals, Inc.*, No. 1:14-cv-8353-PAC (S.D.N.Y.)<sup>1</sup>

Dear Judge Crotty,

I write on behalf of all defendants in the above-captioned matters, and in accordance with Local Civil Rule 7.1(d) and the Court's Individual Rule 1(E), to request an extension of time to answer or otherwise respond to the complaint in the above captioned matter.

The date on which defendants are currently due to answer or otherwise respond is February 10, 2015. During the January 21, 2015, pre-motion conference, the Court granted the parties the opportunity to resolve this matter by February 25, 2015, the date of the next scheduled conference, without the unnecessary distraction of litigation. The Court noted that the litigation will resume if the parties fail to reach a resolution by that date and ordered the parties to submit a case management plan by February 23, 2015.

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<sup>1</sup> Per the Court's January 21, 2015, Order (Dkt. 22), this action has been consolidated with *Roth v. RA Capital Management, LLC*, No. 1:14-cv-8594-PAC (S.D.N.Y.). Counsel for plaintiffs have indicated to defendants that plaintiffs plan to serve and file a Consolidated First Amended Complaint, which will reflect the consolidation.

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Counsel for all defendants have conferred and, in order to promote efficiency in the conduct of this action, seek to bring a joint motion for an extension of time to answer or otherwise respond to the complaint until March 17, 2015, which is 20 days after the next scheduled conference. This is defendants' second request for an extension of time. The Court granted defendants' previous request.

Defendants have conferred with counsel for plaintiffs and confirmed that plaintiffs consent to defendants' joint motion.

Respectfully submitted,

By: /s/ Derek Musa

Derek Musa

Dennis H. Tracey, III

Hogan Lovells US LLP

875 Third Avenue

New York, NY 10022

Tel: (212) 918-3000

Fax: (212) 918-3100

derek.musa@hoganlovells.com

*Attorneys for Defendants, RA Capital Management, LLC, RA Capital Healthcare Fund, L.P. and Peter Kolchinsky*

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Robert H. Pees  
Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
New York, NY 10036-6745  
[rpees@akingump.com](mailto:rpees@akingump.com)  
Tel: (212) 872-1072  
Fax: (212) 872-1002

*Attorneys for Defendant, Blackwell  
Partners, LLC*

John F. Batter, III  
Ari J. Savitzky  
Wilmer Cutler Pickering  
Hale and Dorr LLP  
60 State Street  
Boston, MA 02109  
Tel: (617) 526-6754  
Fax: (617) 526-5000

*Attorneys for Nominal Defendant  
Achillion Pharmaceuticals, Inc.*

cc: David Lopez, Esq.  
Glenn Ostrager, Esq.  
Paul Wexler, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of January 2015, I served the foregoing document upon all registered counsel in the case via the Court's CM/ECF system by filing the document electronically with the Clerk of Court.

New York, New York

/s/ Derek Musa  
Derek Musa